

# EXHIBIT 1

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

IOENGINE, LLC  Plaintiff/Counterclaim Defendant,  v.  PAYPAL HOLDINGS, INC.,  Defendant/Counterclaim Plaintiff.	C.A. No. 18-452-WCB
INGENICO INC.,  Plaintiff,  v.  IOENGINE, LLC,  Defendant.	C.A. No. 18-826-WCB
IOENGINE, LLC,  Counterclaim Plaintiff,  v.  INGENICO, INC., INGENICO CORP., and INGENICO GROUP S.A.,  Counterclaim Defendants.	

**BUSINESS RECORD CERTIFICATION OF WESTERN DIGITAL CUSTODIAN OF  
RECORDS**

I, Matthew Buchanan, do hereby declare and certify:

1. I am over 18 years of age.
2. I am currently employed by Western Digital Technologies, Inc., as Assistant General Counsel, Legal. I have been employed in the legal department at Western Digital since 2016, and before that, at SanDisk Corporation ("SanDisk") since 2014.

3. I have the authority to certify the records discussed herein and I am authorized to submit this Certification on behalf of Western Digital Technologies, Inc., and its applicable affiliates (“Western Digital”).
4. I am familiar with the type of documents and records received, created, and relied upon by Western Digital in its ordinary course of business.
5. Western Digital acquired SanDisk in 2016. I understand that SanDisk previously acquired M-Systems Ltd. (“M-Systems”) in 2006 and MDRM in 2005.
6. When Western Digital acquired SanDisk in 2016, it obtained access to SanDisk’s business records, which I understand included business records of the previously acquired M-Systems and MDRM.
7. I understand and am informed that Western Digital has incorporated into its business, relied upon in conducting its business, and has a substantial interest in the accuracy of business records of SanDisk, M-Systems, and MDRM as part of its regular course of business.
8. In response to subpoenas served on Western Digital in the above-entitled actions, Western Digital made several productions between March 2021 and July 2021, including but not limited to documents with beginning Bates numbers: WDC0000252, WDC0000282, WDC0000369, WDC0000384, WDC0000387, WDC0000422, WDC0000786, WDC0001037, WDC0001171, WDC0001255, WDC0001263, WDC0001902, WDC0002600, WDC0002601, WDC0002602, WDC0002603, WDC0002604, WDC0002605, WDC0002663, WDC0002882, WDC0002981, WDC0003513, WDC0003600, WDC0006075, WDC0008105, WDC0008106, WDC0008108, WDC0011495, WDC0011514, WDC0012012, WDC0012032, WDC0012104, WDC0012119, WDC0013220, WDC0013235, WDC0013894, WDC0014181, WDC0016769, and WDC0016772 (the “Exhibits”).



9. I understand and am informed that the Exhibits are business records of SanDisk or M-Systems that have been incorporated into the business records of Western Digital and have been relied upon as such.
10. Western Digital produced each Exhibit with metadata. To the extent possible, the Date and Time Last Modified and the Date and Time Created metadata for each Exhibit represents a true and accurate copy of the data, if any, associated with each Exhibit. For certain Exhibits, such as those collected from hardcopy documents (WDC0013894 and WDC0016769) and as spreadsheets (WDC0002600, WDC0002601, WDC0002602, WDC0002603, WDC0002604, WDC0002605), the Date and Time Last Modified or the Date and Time Created metadata may reflect approximately when the document was collected.
11. I understand and am informed that each of the Exhibits are kept in the regular and ordinary course of the business of Western Digital and were made at or near the time of the events set forth therein by people with knowledge of those matters. I also understand and am informed that it was the regular practice of SanDisk and M-Systems to make and maintain records such as the Exhibits.

I declare under penalty of perjury that the foregoing is true and correct.

DATED: May 13, 2022

**Western Digital Technologies, Inc.**

By: Matthew Buchanan

Name: Matthew Buchanan

Title: Assistant General Counsel, Legal

# **EXHIBIT 2**

**Redacted In Its Entirety**

# EXHIBIT 3

## Contact

[www.linkedin.com/in/yuval-alpert-a7569713](https://www.linkedin.com/in/yuval-alpert-a7569713) (LinkedIn)

## Top Skills

Semiconductors  
Product Management  
Embedded Systems

# Yuval Alpert

Director of Product Management (SSD) at SanDisk  
Israel

## Experience

### SanDisk

18 years 9 months

Director of Product Management (SSD)  
January 2015 - Present (7 years 6 months)

Israel

### SSD Product Marketing Manager

November 2011 - December 2014 (3 years 2 months)

### SSD Marketing, Customer Program Manager

July 2007 - November 2011 (4 years 5 months)

### DiskOnKey Marketing, Project Manager

December 2005 - July 2007 (1 year 8 months)

### DiskOnKey Marketing, Product Manager

October 2003 - December 2005 (2 years 3 months)

### Israeli Air Force

Various positions as academic reservist

1997 - 2003 (6 years)

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## Education

### Technion - Israel Institute of Technology

MBA, Business Administration, focused on management of high tech companies · (2000 - 2002)

### Technion - Israel Institute of Technology

BSc, Industrial Engineering and Management · (1993 - 1997)

handasahim high school

**Exhibit 4**

# EXHIBIT 4



**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

INGENICO INC.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
IOENGINE, LLC,	)	
	)	
Defendant.	)	
_____	)	
	)	
IOENGINE, LLC,	)	
	)	
Counterclaim Plaintiff,	)	C.A. No. 18-826-WCB
	)	
v.	)	
	)	
INGENICO INC., INGENICO CORP. and	)	
INGENICO GROUP S.A.,	)	
	)	
Counterclaim Defendants.		

**BUSINESS RECORD CERTIFICATION OF WESTERN DIGITAL CORPORATION**  
**CUSTODIAN OF RECORDS**

I, \_\_\_\_\_, do hereby declare and certify:

1. I am over 18 years of age.
2. I am currently employed by Western Digital Corporation (“Western Digital”), and my official title is \_\_\_\_\_.
3. I have been employed by Western Digital since \_\_\_\_\_.
4. I am familiar with the type of documents and records received, created, and relied upon by Western Digital in its ordinary course of business.
5. I have the authority to certify the records discussed herein and I am authorized to submit this Certification on behalf of Western Digital.

[ PAGE \\* MERGEFORMAT ]

6. Each of the records contained in WDC0000001-WDC0016734 produced on March 12, 2021, March 22, 2021, March 30, 2021, June 25, 2021, and July 6, 2021 in response to a subpoena served on Western Digital on January 7, 2021 is the original record or an exact duplicate of the original record in the custody of Western Digital.
7. These records were kept in the course of regularly conducted activity of Western Digital and its predecessors.
8. Making these records was a regular practice of that activity.
9. These records were made at or near the time of the occurrence of the matters set forth in the records by someone with knowledge or from information transmitted by someone with knowledge.
10. All metadata provided with each of these records is a true and accurate copy of data that was generated by a computer output and is kept in the course of regularly conducted activity in the ordinary course of business.

I declare under the pains and penalties of perjury that the foregoing is true and correct.

DATED: XX/XX/2021

**Western Digital Corporation**

By:

\_\_\_\_\_

Name:

Title:

# EXHIBIT 5

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

IOENGINE, LLC

Plaintiff/Counterclaim  
Defendant,

v.

PAYPAL HOLDINGS, INC.,

Defendant/Counterclaim  
Plaintiff.

C.A. No. 18-452-WCB

INGENICO INC.,

Plaintiff,

v.

IOENGINE, LLC,

Defendant.

C.A. No. 18-826-WCB

IOENGINE, LLC,

Counterclaim Plaintiff,

v.

INGENICO, INC., INGENICO CORP., and  
INGENICO GROUP S.A.,

Counterclaim Defendants.

**BUSINESS RECORD CERTIFICATION OF WESTERN DIGITAL CORPORATION**  
**CUSTODIAN OF**  
**RECORDS**

I, [Matthew Buchanan](#), do hereby declare and certify:

1. I am over 18 years of age.

2. I am currently employed by Western Digital ~~Corp. as [a] [job title].~~ [Technologies, Inc., as Assistant General Counsel,](#)

*[Different first page setting changed from off in original to on in modified.].*

3Legal. I have been employed ~~by~~in the legal department at Western Digital ~~Corp.~~ since ~~{year}~~2016, and before

that, at SanDisk Corporation ("SanDisk") since 2014.

*[Different first page setting changed from off in original to on in modified.]*

~~43.~~ I have the authority to certify the records discussed herein and I am authorized to submit this Certification on behalf of Western Digital ~~Corp~~ Technologies, Inc., and its applicable affiliates ("Western Digital").

~~54.~~ I am familiar with the type of documents and records received, created, and relied upon by Western Digital ~~Corp.~~ in its ordinary course of business.

~~65.~~ Western Digital ~~Corp.~~ acquired SanDisk in 2016. ~~Previously, in 2006, I understand that~~ SanDisk previously acquired M-Systems, ~~and SanDisk acquired~~ Ltd. ("M-Systems") in 2006 and MDRM in 2005.

~~76. I am aware that when~~ When Western Digital ~~Corp.~~ acquired SanDisk in 2016, it ~~acquired~~ SanDisk's obtained access to SanDisk's business records, which I understand included ~~the~~ business records of the previously acquired M-Systems and MDRM. ~~Through these acquisitions and accompanying changes in corporate form, Western Digital Corp. is now the lawful custodian of M-System's and MDRM's business records.~~

~~8. The business records of M-Systems, MDRM, and SanDisk were transferred to and maintained by Western Digital Corp as part of the ordinary and regular course of the acquisition.~~

~~9. Western Digital Corp. has incorporated into its business the business records of SanDisk, M-Systems, and MDRM.~~

~~10. Western Digital Corp. has relied upon the business records of SanDisk, M-Systems, and MDRM in conducting its business.~~

~~117.~~ I understand and am informed that Western Digital ~~Corp.~~ has incorporated into its business, relied upon in conducting its business, and has a substantial interest in the accuracy of ~~the~~ business records of SanDisk, M-Systems, and MDRM as part of its regular course of business.

~~12. [[Exhibits \_\_, WDC 000 ] (the "Exhibits") were business records of M-Systems and~~  
8. In response to subpoenas served on Western Digital in the above-entitled actions, Western



*[Different first page setting changed from off in original to on in modified.]*

Digital made several productions between March 2021 and July 2021, including but not limited to documents with beginning Bates numbers: WDC0000252, WDC0000282, WDC0000369, WDC0000384, WDC0000387, WDC0000422, WDC0000786, WDC0001037, WDC0001171, WDC0001255, WDC0001263, WDC0001902, WDC0002600, WDC0002601, WDC0002602, WDC0002603, WDC0002604, WDC0002605, WDC0002663, WDC0002882, WDC0002981, WDC0003513, WDC0003600, WDC0006075, WDC0008105, WDC0008106, WDC0008108, WDC0011495, WDC0011514, WDC0012012, WDC0012032, WDC0012104, WDC0012119, WDC0013220, WDC0013235, WDC0013894, WDC0014181, WDC0016769, and WDC0016772 (the "Exhibits").

~~MDRM~~9. I understand and am informed that the Exhibits are business records of SanDisk or M-Systems that have been incorporated into the business records of Western Digital ~~Corp.~~ and have been relied upon as such.

~~13. The Exhibits were produced on [March 12, 2021, March 22, 2021, March 30, 2021, June 25, 2021, and/or July 6, 2021] in response to a subpoenas served on Western Digital Corp. in the above-entitled actions.~~

~~14. I am familiar with the normal business operations of Western Digital Corp. including with the maintenance of and the retrieval of the Exhibits [by/through/via ... add information relating to knowledge/familiarity].~~

~~15~~10. Western Digital Corp. produced each Exhibit with metadata. ~~The metadata for each Exhibit was automatically generated by the computer from which the Exhibit was retrieved, showing, among other information~~To the extent possible, the Date and Time Last Modified and the Date and Time Created.

~~16. The~~ metadata for each Exhibit ~~is~~represents a true and accurate copy of the data, ~~if any~~, associated with each Exhibit. For certain Exhibits, such as those collected from hardcopy documents (WDC0013894 and WDC0016769) and as spreadsheets (WDC0002600, WDC0002601, WDC0002602, WDC0002603, WDC0002604, WDC0002605), the Date and Time Last Modified or the Date and Time Created metwinta may reflect approximately when the document was collected.

~~17. The metadata is kept in the course of regularly conducted activity by Western Digital Corp. in its ordinary course of business.~~

~~18~~11. ~~Each~~I understand and am informed that each of the Exhibits are kept in the regular and ordinary course of the business of Western Digital Corp and ~~its predecessors. Specifically, the Exhibits and the metadata are maintained, like the rest of Western Digital Corp.'s business records by (details regarding maintenance of documents)~~

were made at or near the time of the events set forth therein by people with knowledge of those matters. I also understand and am informed that it ~~19. Each of the Exhibits was~~

~~made contemporaneously with the occurrence of the matters set forth therein.~~

~~20. Each of the Exhibits was made by someone with knowledge of the content therein or from information transmitted by someone with knowledge.~~

21. It was the regular practice of SanDisk and M-Systems ~~and MDRM~~ to make and maintain records such as the Exhibits.

I declare under ~~the pains and penalties~~penalty of perjury that the foregoing is true and correct.

DATED: ~~XX/XX/2021~~May 13, 2022

**Western Digital ~~Corporation~~Technologies, Inc.**

By: \_\_\_\_\_

Name: Matthew Buchanan

Title: Assistant General Counsel, Legal

**CERTIFICATE OF SERVICE**

I, Eve H. Ormerod, hereby certify that on June 13, 2022, a true and correct copy of the foregoing document was served on the following counsel via email:

Jack B. Blumenfeld  
Brian P. Egan  
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/s/ Eve H. Ormerod  
Eve H. Ormerod (No. 5369)